

PART 1 - PROJECT NARRATIVE

Objectives –

The ***** Department of Human Services (*****), Division of Aging and Adult Services, Senior Community Services Employment Program (SCSEP) promotes and fosters useful part-time employment in community service activities for unemployed low-income persons age 55 and older. The intent of the program is to place participants into subsidized jobs and give training and counseling services to move participants into unsubsidized employment.

Results and Benefits –

The benefits and results of SCSEP are two fold. First, SCSEP provides jobs to unemployed seniors while assisting community service and government agencies with employee vacancies. Secondly, the positions are typically with government and non-profit agencies, thus benefiting the community. The host agency that hires the senior has the benefit of being provided a financial incentive for employing the worker. The senior employee receives job skills training while in subsidized employment and is supported while looking for unsubsidized employment. SCSEP is a win-win program for both the employee and the employer.

Program Approach –

The Division of Aging and Adult Services, the prime sponsor, will conduct SCSEP through sub-grants to community-based agencies with administration and management capabilities to carry out the program in accordance with the SCSEP regulations. The sub-grantees, ***** and *****, will recruit and select eligible individuals for enrollment.

The sub-grantees will recruit non-profit community agencies to provide subsidized employment for qualifying participants.

Geographic Areas –

***** is a large state geographically, with the majority of urban counties located on the “front range” (east of the continental divide). These counties include ***, ***, *** and ***. *** County, is the only urban county on the “western slope” (west of the continental divide) ranked in the top 10 urban counties. The remaining fifty-four (54) counties of the State are essentially rural, where agriculture is the major industry.

The State of ***** had a total of 581 slots allocated for SCSEP; of these slots 104 of them are State slots with the remaining slots being national contractor slots. The State’s 104 slots are divided: 45 slots are awarded to ***** for southern rural *****; and 59 slots are awarded to ***** for metropolitan areas, along the front range. *****, a national contractor was allocated 292 slots and *****, another national contractor in the State of *****, was allocated 185 slots.

Section 1 – State Senior Employment Services Coordination Plan

The State Senior Employment Services Coordination Plan is a vehicle for developing SCSEP. The plan describes coordination with national contractors, members of the Older Workers Task Force, ***** Department of Labor and Employment, the sixteen Area Agencies on Aging, ***** Commission on Aging, SCSEP participants, and other seniors over the age of 55. As a vehicle for developing the program, the grant is the impetus that makes it possible to provide the program.

Section 2 – Technical Approach

A. Economic Overview

The descriptive technical approach in the grant describes how the plan will be implemented. Additionally the plan describes the basic distribution of the slots, which is in accordance to the implementation of the grant.

A. Regional Economic Overview

By: ****, State Statistical Specialist and ****, Labor and Agribusiness Extension Economist

1. National Trends

Recent labor market trends have been mixed: employment growth is negative, but unemployment rates are also down. Following four months of job gains, non-farm employment decreased by 43,000 jobs in September. Meanwhile the national unemployment rate dipped from 5.7% in August to 5.6% in September following a downward trend starting in May 2002. This may indicate that some are moving off unemployment benefits or discontinued their search for employment, since new employment opportunities remain sparse.

Manufacturing led the U.S. into the current recession and recent indicators raise worries about a possible double-dip recession. Sectors especially hit were electronic equipment and industrial machinery and aircraft manufacturers. Construction has been fairly resilient during the recession bolstered by record low 30-year fixed mortgages, but in August, the value of non-residential construction fell by 2.0%, existing homes sales declined by 1.7% and housing starts fell 2.2%. The strongest sectors continue to be health services and finance.

2. Regional Trends

Among the four regions, the West continued to register the highest unemployment rate in August, 6.1 percent. Among states, New Mexico had the largest rate increase from a year ago (+1.4 percentage points), with ***** and Massachusetts posting the next largest rate increases (+1.3 and +1.2 points, respectively). Georgia recorded the largest percentage decline in employment (-2.3 percent), followed by Washington (-2.0 percent), ***** (-1.9 percent), and Missouri and Utah (-1.8 percent each).

3. State Trends

The good news for ***** is that job reductions are slowing, however job gains remain relatively small. The August unemployment rate was 5.1%, down from the high of 5.7% in February 2002, but still 1.3 points higher than a year ago. Employment rose in April and May, the first gains in 15 months and then fell again in June and July before increasing in August (primarily in the service and government sectors).

Yet, indicators suggest that ***** is still in a recession. 2002 will see the largest job loss in state history, a drop in real personal income, and the first decline in retail sales since 1986. Data from the Center for Business and Economic Forecasting show a decline of 73,000 jobs in the last 12 months. Job losses over the past two months were concentrated in communications, retail trade and business services. The effects of drought and fires on tourism can explain some of the weakness in retail trade.

Based on jobs data, the ***** economy has performed much worse than the nation during the recent downturn.

Similar to national trends, the construction industry is showing signs of slowing in *****. Although sales of new homes continue to increase, experts believe they may decline by 10% in 2003. According to the US Census Bureau the number of permits for multi-family units dropped 38.5% in the past year. Vacancy rates were 9.3% in the second quarter in metro-*****, the highest rate in 12 years. The metro area office vacancy rates are up 50% from a year ago (with between 17 and 22% vacant).

4. Employment Forecast

The next twelve months should see expansions of output and hiring in *****'s tech sectors and an improved outlook for tourism. Recovery in the telecommunications or commercial real estate sectors will likely be delayed until 2004 or later. Job growth is forecast at 33,000 jobs or 1.5 % for the next year. This compares to the 70,000 to 80,000 jobs added each year during the late 1990s. The total number of jobs in the state is not expected to reach its previous 2001 high again until early 2004.

5. SCSEP will train participants to meet the needs of the tourism sector and the technology sector. Many of the technological positions require specialized skills. Several SCSEP participants have the skills. Those that do not have the skills or training needed, classes will be available to upgrade their skills. The tourism industry is growing. Participants will be

encouraged to look for employment as tour guides, ***** hosts and hostesses, concierges, bus maintenance, and train attendants.

B. Plan of Action

1. Recruitment and selection of participants

The sub-grantee shall recruit and select participants for the program. The agencies will assure that the recruitment of participants will be targeted to individuals who are 55 years or older and will prioritize placement to Veterans, or spouses of Veterans, people with an income of 125 percent or less of the federal poverty guidelines. Additionally, priority will be given to people age 65 and older, people homeless or at risk of being homeless, people residing in rural areas, minorities, people with limited English proficiency, and people with the greatest economic need. Vacancies will be listed with the Workforce Investment Act – One-Stop Centers.

a. Accomplishment of Goals

1. Planning meetings with members of the media to target hard to reach senior populations.
2. Coordinate with the Veterans Service Office at the One-Stop Centers.
3. Fliers to targeted agencies, shelters, churches, grocery stores, recreation center, and senior centers, etc.
4. Public Service ads in targeted newspapers, radio, and television.
5. Presentations to community organizations.

6. SCSEP participants speaking publicly about their own experiences.
 7. Speaking at senior living centers.
 8. Participating in community fairs.
 9. Coordination with the One-Stop Centers.
- b. Priorities in the Selection Process
1. Section 516(2) of the Older Americans Act (OAA) states only individuals who are at least 55 years of age who with a total household income of 125 percent or less of the federal poverty guidelines are eligible to receive SCSEP services.
 2. In accordance with section 502(b)(1)(M), priority is to be given to:
 - a. Minority, limited English-speaking, individuals;
 - b. Individuals over the age of 65;
 - c. People with a disability;
 - d. Those at risk of homelessness;
 - e. People that reside in rural areas;
 - f. Individuals who are low employment prospects;
 - g. Individuals who failed to find employment through WIA Title 1 services;
 - h. Indian eligible individuals;
 - i. and eligible individuals who have the greatest economic need, at least in proportion to their numbers in the State

and take into consideration their rates of poverty and unemployment.

3. In addition, persons shall receive priority for veterans in all Department of Labor “qualified” job- prior training programs. As defined at section 2(a)(2)(C) of the JVA, which amends 38 U.S.C. 4215, SCSEP meets the qualifying criteria as a “program or service that is a workforce development program targeted to specific groups.” Persons covered by this requirement are defined at section 2(a)(1) of the statute (38 U.S.C. 4215 (a)(1)) as follows:

- a. A veteran
- b. The spouse of any of the following individuals:
 1. Any veteran who died of a service-connected disability.
 2. Any member of the Armed Forces on active duty, who has been listed for a total of more than 90 days as missing in action, captured in the line of duty by a hostile force, or forcibly detained by a foreign government or power.

3. Any veteran who has a total disability resulting from a service-connected disability.
 4. Any veteran who died while a disability so evaluated was in existence.
4. The veterans' priority requirements must be integrated with the special consideration preferences delineated at section 502(b)(1)(M) of the OAA. In applying these preferences, grantees are not expected to find such participants; but rather, when faced with enrolling several individuals, preference should be given to the individual with these characteristics. If no individual possesses the preferred characteristics, then the enrollment must still be based on the age and veteran priorities.
 1. Priority for age and Veterans shall be determined in the following manner:
 - a. Eligible Individuals Age 65 or Older:
 1. Veterans and qualified spouses who meet the special consideration criteria (if feasible).
 2. Veterans and qualified spouses who do not meet the special consideration criteria.
 3. Non-veterans who meet the special consideration criteria (if feasible).
 4. Non-veterans who do not meet the special consideration criteria.

b. Eligible Individuals Ages 55-64:

1. Veterans and qualified spouses who meet the special consideration criteria (if feasible).
2. Veterans and qualified spouses who do not meet the special consideration criteria.
3. Non-veterans who meet the special consideration criteria (if feasible).
4. Non-veterans who do not meet the special consideration criteria.

2. Eligibility

Each applicant's eligibility shall be established, documented, and retained on record. The SCSEP staff shall review documentation of citizenship status, age, income, and place of residence. Documentation will be recorded in the participant's file that was reviewed to establish eligibility. The form contains space and a series of choices for attesting to the source of eligibility. Choices for documentation may include a driver's license, photo identification, birth certificate, Social Security/Medicare card, and a place to list other sources for documentation.

3. Continued Eligibility for SCSEP

Participants shall be re-certified according to place of residence and income at least once each program year between July 1st and June 30th. Re-certification shall be accomplished according to the

schedules established by the sub-grantee and approved by the State sponsor. The documentation gathered for re-certification or non-certification will be placed in the participant's file. Those participants found ineligible due to income limitations shall be notified of their ineligibility within ten working days. Termination of the participant will be effective 30 days following written notification.

Participants determined ineligible for the program shall be provided with a written explanation of their appeal rights. The participant will be referred to the local One-Stop Center.

B. Physical Examination

A physical examination may be offered to each participant annually. A record of the offer of examination will be maintained in the participant's file. Examination results will not be maintained in the participant's file. The participant shall be advised that the release of the medical examination is optional. If the participant refuses to have a physical examination, a signed waiver shall be requested from the participant. The waiver will be maintained in the participant's file. The results of the examination will not be taken into consideration in determining placement into a community service assignment. Sub-grantees have been instructed to encourage participant's to take advantage of the annual physical exam as a benefit of the program.

C. Orientation

1. Sub-grantee

The sub-grantee shall provide orientation to the host agency. The orientation shall provide information related to: project objectives; community service assignments; training; supportive services; submission of schedule and time sheets; method of wage payment; procedures for reporting work related accidents; responsibilities; rights and duties; permitted and prohibited political activities; rotation of participant; plans for transition to unsubsidized employment; and discussion of safe working conditions at the host agency.

2. Host Agency

The host agency will supervise the participant. It is imperative that the host agency provides adequate orientation, supervision, instruction, and a safe working environment for the participant's. The goal of the host agency is to prepare the participant for unsubsidized employment.

D. Assessment

The sub-grantee will complete an initial assessment of each new participant to determine the most suitable program assignment for the individual. The assessment information will be recorded in the participant's file and will include: participant work history; skills; aptitudes; physical limitations and barriers to employment; education level; and interests. Participants will be reassessed at least twice each year.

E. Individual Employability Plan (IEP)

The IEP will be developed in consultation with the participant and will be based on information outlined in the participant assessment. The IEP will include steps

to be taken to achieve employment, skill training, and job seeking assistance, leading to unsubsidized placement. The participant and the SCSEP staff person will sign the plan. At a minimum, the IEP must be updated, at least twice annually and more frequently, if necessary.

In some instances, a participant's IEP may show a goal of obtaining an unsubsidized job with a public or private employer that requires specific skills that are not attainable through the regular community service assignment. In these instances, the grantee may elect to provide the participant with an "on the job experience" (OJE) assignment.

The IEP will be utilized in determining the most appropriate community service assignment for the participant.

F. Assignment to Community Service

Upon completion of a participant's orientation and pre-job training, the sub-grantees shall assess skills and experience and place the participant into a subsidized, part-time assignment as a part of the agreed upon plan.

1. Participants shall be employed with host agencies involved in community services, including services to the aged such as social, health, welfare, educational, legal and/or other counseling, community betterment or beautification services, services of Area Agencies on Aging, and other services that are essential and necessary to the community.
2. Sub-contractors will assess participant skills, experience, and occupational interests through individual counseling sessions and using available assessment instruments. Work requirements and job specifications will be

elicited from host agencies and openings matched with participants' skills, experience, and interests.

3. Participants will be assigned to sub-project administration. Work assignments will be congruent with skills and interests. Services provided are in addition to those that would normally be provided, thus ensuring the creation of employment opportunities to people over 55 years of age.
4. Agencies which contribute to the general welfare of the community and which are local, State, or Federal government agencies or those with 501 (c) (3) Internal Revenue Services and tax-exempt status will be considered for host agency sites. Workers will not be assigned to sites that contribute to any sectarian, religious, or political activity. All participant employment will be in addition to that which would normally be provided by the host agency.
5. The start date for a participant begins when the participant is assigned to a host agency/community service. Each sub-grantee shall provide an average of 20 hours of work per week per participant. Subsidized employment positions under a sub-project may provide 1,300 hours or more of work annually per participant based upon the sub-grantee's budget. Sub-projects may not require any participant agreement, nor may they assign a participant to work less than an average of 20 hours per week, unless it is mutually agreed to in writing.
6. A participant will not work at a host agency for more than twelve months at a time. The sub-grantee will assist the participant in finding another

host agency upon completing the twelve-month timeframe. Extenuating circumstances may require that the sub-grantee not rotate the participant, if this circumstance arises the sub-grantee must receive approval from the State if the participant will continue to work in the same position for more than twelve months.

7. The pay rate for participants will be at least \$6.85 per hour. The current average participant wage rate is \$6.85 per hour.
8. Fringe benefits shall be administered by the sub-grantees uniformly to all participants including those in temporary positions. Benefits may include but are not limited to the following:
 - a. Necessary sick leave, and federal holiday leave as designated by the employer;
 - b. Annual physical exam;
 - c. Workers Compensation;
 - d. Other approved by the state sponsor; and
 - e. All fringe benefits must be “zeroed-out” by June 30, 2008 .
9. The Division of Aging and Adult Services and sub-grantees shall ensure that participants receive adequate orientation and instruction from their work-site supervisors with regard to job responsibilities, duties, and job safety. An assessment shall be completed of a participant’s potential for transition into unsubsidized employment. The sub-grantees will make periodic visits to job sites to determine that host agency supervision is adequate.

G. Training During Community Service Assignment and Other Training

1. The sub-grantee shall provide or arrange for training as prescribed through the IEP of the participant thus maximizing the effectiveness of the community service assignment. The sub-grantee, on a quarterly basis, will provide group trainings and employment programs to enhance the participant's experiences with SCSEP. Samples of training programs include resume writing; public speaking skills; conflict resolution; and safety training.
2. The participant's IEP may show a goal of obtaining an unsubsidized job with a public or private employer that requires specific skills that are not attainable through the regular community service assignment.
3. The participant will be paid the established wage rate for training in relation to the participant's IEP.

H. On the Job Experience (OJE)

1. OJE is a program offered to both participants of SCSEP and employers, both public and private. The participant must complete a community service assignment for a minimum of two weeks prior to participating in OJE. The participant through OJE may have an opportunity to pursue training and employment opportunities, which may not be available through community service. OJE provides incentives to employers through the subsidy of costs associated with training and wages.
2. The sub-grantee and the public or private employer through OJE will enter into a voluntary contract. The contract must specify:

- a. The employer is not an active host agency;
- b. Specific skills to be learned by the OJE employee;
- c. Training timelines and benchmarks to be achieved;
- d. Hours to be worked;
- e. Number of weeks the OJE employee will work; and
- f. Verifications by the sub-grantee:
 - 1. Any other OJE training program has not employed the OJE employee in the last twelve months;
 - 2. OJE training plan is based on the employee's IEP;
 - 3. The OJE employee has completed a minimum of two weeks community service training prior to being accepted into the OJE assignment;
 - 4. The OJE employee records contain all the documentation for SCSEP participants in addition to any OJE employee documentation;
- g. The employer must agree to hire or retain the OJE employee at the end of the training period;
- h. The sub-grantee will provide follow-up to resolve potential unsafe conditions or issues that arise;
- i. The amount the employer will be reimbursed or the amount the OJE employee will be paid during the OJE training period;

- j. Who will be responsible for workers compensation claims during OJE training;
 - k. No OJE employee will work more than 40 hour per week which may include community service training, and no OJE training may exceed twelve weeks;
 - l. The potential employer may be reimbursed by the sub-grantee for up to 100 percent of the wages earned by each participant in the OJE training that will last no more than four weeks. OJE training that exceeds the four weeks but lasts no more than twelve weeks, the potential employer may be reimbursed for up to 50 percent of the wages earned by each participant in OJE training.
 - m. In lieu of reimbursement arrangement, the sub-grantee may opt to pay 100 percent of the participant's wages earned while OJE training.
- ii. Projects that will be offered with OJE programs will include training assignments that provide experiences not typically offered in community service assignments. The OJE training will fill the gaps of training programs that provide the participant with needed experiences to obtain unsubsidized job placements. Examples of OJE projects may include:
- a. Training at a law firm as an assistant to a clerk
 - 1. Legal file search training;
 - 2. Computer training – word processing; and
 - 3. Phone skills training.

- b. Training as a cashier at a local supermarket
 - 1. Cash register operation training;
 - 2. Scanner training; and
 - 3. Customer service training
- c. Training as a teller at a local bank
 - 1. Customer service training;
 - 2. Computer cash machine training; and
 - 3. Basic math skills training
- 4. Participant's wages for OJE training will be at least \$6.85 per hour. The current average participant wage rate is \$6.85 per hour. Employers may be reimbursed up to 100 percent of the wages for the participant in an OJE training that does not exceed four weeks.
- 5. Participants in OJE may work up to 40 hours per week, which includes time spent in a community service assignment if the participant is participating in a community service program as well as OJE. Participants may not be in OJE longer than twelve weeks and may only participate in OJE once in a twelve-month period.
- 6. Characteristics of a participant of OJE
 - a. A participant qualifying for OJE must meet all the same qualifications of SCSEP participants (refer to recruitment and selection of participants A1). The OJE participant must complete two weeks of community service prior to beginning an OJE program. OJE participants may have skills they have not used in

several years and the participant may need an educational refresher to get back into the workforce. The IEP will guide the OJE training plans.

7. Health and Safety

- a. As in the community service programs the OJE will have the same health and safety requirements. Prior to placing an OJE participant, the sub-grantee must complete a health and safety inspection with the potential employer. The health and safety inspection will be maintained in the OJE participant's file. Each sub-grantee will assure that all participants of OJE follow established safety policies and comply with all laws, rules, and regulations in regards to health and safety. A safety manual will be provided to all OJE participants and employers by the sub-grantee.
- b. The participants will be educated on the complaint procedures in regards to a potential safety violation.
- c. The sub-grantees will monitor agencies/businesses that contract for OJE participants. Monitoring will occur via phone or in person at least monthly.

8. OJE Participant File

OJE participant's files will be maintained the same as the SCSEP participant. The application to the SCSEP program will be included in the participant's file:

- a. IEP;
- b. Income Eligibility Statements;
- c. Orientation Record;
- d. OJE assignments;
- e. Monitoring of Health and Safety Agency;
- f. Physical Examination;
- g. Agreement to a Drug Free Workplace Policy;
- h. Participant Assessment;
- i. Payment Authorization Forms;
- j. Agency Assessment; and
- k. Participant follow-up.

9. Supportive Services

- a. Sub-grantees may hire job developers. The job developers counsel participants on resume writing, interview skills, finding unsubsidized employment, follow-up after the interview, and creative ways to develop job skills. Case managers, such as, social workers are used as needed to address specific areas of concern for a client. Sub-grantees provide workshops on conflict management training. The Social Security Administration provides workshops on how full or part-time employment may affect disability insurance. Workforce centers provide practice interview sessions, and debriefing after interviews for coaching. The grantee provides

an annual job fair with employers specifically looking for older workers.

I. Participant Transportation Issues

Solutions for transportation difficulties include:

- a. The sub-grantee may arrange for and expend project funds for the transportation of enrollees, provided the transportation is either accomplished in the direct performance of employment-related activities or is accomplished from central pick up points to work-sites in cases where public transportation is inadequate.
- b. Participants who use their own vehicle to attend mandatory meetings maybe reimbursed for mileage. Participants who use their own vehicle to go to work are not reimbursed for mileage.
- c. The reimbursement rate will not exceed the mileage rates established by the U.S. Department of Labor.
- d. Sub-grantees have the flexibility to use grant funds to assist participants with transportation costs.
- e. Grantee's staff participates on State transportation committees. Committees have been formed to discuss the problems and solutions to senior transportation needs throughout the State of ***** including rural and metro areas.

J. Placement Into Unsubsidized Employment

1. The sub-grantee shall emphasize and provide assistance to participants in obtaining unsubsidized employment in private or public sector jobs

thereby creating additional opportunities for other eligible individuals and increasing services with the available funds.

2. The number of participants placed in unsubsidized employment during the program year shall equal, where possible, 31 percent of the number of authorized positions.
3. Pursuant to this goal, the Division of Aging and Adult Services, ***** Department of Human Services, will assist and encourage sub-grantees to:
 - a. Coordinate and work with the local Work Investment Act (WIA) at the One-Stop Workforce Center;
 - b. Staff, including the Older Worker Specialist where available, in identifying suitable unsubsidized job openings and other job related assistance available through the agency;
 - c. The sub-grantee will advertise all openings with SCSEP through the One-Stop Workforce Centers. As a requirement to participate in the SCSEP program participants will register with the One-Stop Workforce Centers.
 - d. Increase the use of SCSEP participants to staff the older worker placement function in the local One-Stop Workforce Centers to intensify the placement services to older workers;
 - e. Increase coordination with other local employment and training agencies to include SCSEP programs operated by national sponsors and One-Stop Workforce Centers under the WIA in identifying job or training opportunities for SCSEP participants;

- f. Contact and encourage Federal and State agencies to accept qualified participants into their regular, unsubsidized workforce;
- g. Contact and educate public and private employers concerning the resources that older workers bring to the labor force to develop suitable job openings for participants;
- h. Encourage host agencies to employ participants in their regular work force;
- i. Encourage the use of SCSEP workers to assist older job applicants through the WIA at the One-Stop Workforce Centers; Training in older worker issues will be provided to participants assigned to One-Stop Workforce Centers and other employment programs.
- j. Sub-grantees shall provide a 30, 90, and 180 day follow-up with the participant that is placed in unsubsidized employment. Documentation of the follow-up may be completed in person or over the telephone. The follow up will be maintained in writing and placed in the participant file.

4. Maximum Duration of Enrollment

- a. At the end of the two-year placement period, if unsubsidized employment is not found, the participant must take a 90-day exit prior to re-applying to the program. Participants may not exceed two years as a participant in the program without prior written approval from the State. A request by the sub-grantee to extend the participant's time in the program must be made to the state one

month prior to the end of the maximum two-year period. Every effort must be made to enhance the employability of the participants.

5. Individual Employability Plan-Related Terminations

- a. When a participant refuses to accept a job offer for unsubsidized employment consistent with his or her IEP, and there are no extenuating circumstances, the participant may be terminated from the SCSEP. Such termination shall be consistent with administrative guidelines issued by the U. S. Department of Labor and the termination shall be subject to the applicable appeal rights and procedures.
- b. The participant will be given 30 days notice prior to plan related terminations. The project must provide all participants with information regarding the rules for IEP-related terminations. The rules must be presented during orientation for new participants and must be contained in the project's participant handbook or similar document.
- c. An IEP-related termination must be a logical consequence of a violation of the agreements established between the participant and the project staff in the jointly signed IEP. The IEP is based on an assessment of the participant's skill levels, education, work experience, work interests, and labor market information. The participant must understand that in signing the IEP he or she is

entering into an agreement to follow the steps outlined in the plan. There will be consistency of applicable rules and procedures for all participants.

- d. The appeal process contains two levels of review. The staff directly responsible for the IEP related termination decision should excuse themselves from the appeal.
- e. Failure to follow the IEP will result in a corrective action notice. The corrective action notice is a document given to the participant either in person or by registered mail. The notice will contain information regarding the specific incident where the participant failed to fulfill his/her IEP responsibilities. The notice will list the specific event or events; cite the jointly signed agreement provision; and provide a period of 30 days to take corrective action. The notice must clearly state if the participant takes no action to rectify the situation within the 30-day period, termination from the program will ensue. If the corrective action results in termination a termination letter must be sent stating the participant's appeal rights. The letter shall include the appeal procedure with the appropriate time frames and the name of the person to whom the appeal should be made.
- f. Samples of corrective action situations include: refusal to accept the referral to an interview at an employer's place of business, obstructive behavior in the job interview process and or lack of

cooperation by the participant; refusal to continue with training opportunities; refusal to accept community service assignments; refusal to register at the local job service; refusal to accept any services which impact the participant's ability to fully participate in the program or find unsubsidized employment; and other situations that are specifically related to hampering the effectiveness of the program for the participant.

- g. An IEP termination is not appropriate when a participant's circumstances are beyond their control such as: transportation not being available; death of a closely related person impacting the training or work; or the proposed unsubsidized employment is more costly to the participant than the SCSEP position. Each termination must be evaluated on a case-by-case basis.

6. Participant Complaint Resolution

- a. Each sub-grantee will establish the following procedures for resolving any issue arising between the host agency and the participant. These procedures include an opportunity for an informal conference and a prompt determination on the issues. When the participant's supervisor proposes to take an adverse action, such procedures shall include a written notice stating the grounds for action and giving the participant an opportunity to respond either orally or in writing. The adverse action shall be prepared and signed by the participant's supervisor. Final

decisions made as a result of the review process shall be provided to the participant in writing by the sub-grantee. The adverse action process by the sub-grantee shall be completed no earlier than 15 days from the date of receipt of the proposed action, unless the employee's presence constitutes an emergency or is otherwise highly undesirable.

- b. When a complaint is not resolved at the service provider level, the participant may appeal to the Division of Aging and Adult Services (AAS) within 30 days of the sub-grantee decision. AAS shall appoint an impartial three-member board and hold a hearing within 30 days of the receipt of the request for a hearing.
- c. Only unresolved complaints concerning violations of law other than discrimination may be filed with the appropriate office of the Department of Labor. The assurance by the Department of Labor is that the grantee follows participant complaint procedures.

K. Over-Enrollment

- 1. Should attrition or funding adjustments prevent a portion of project funds from being fully utilized, the sub-grantee may use those funds during the period of the agreement to over-enroll additional eligible individuals. The number of over-enrolled may not exceed 120 percent of the total number of authorized positions established under the grant agreement without the written approval of the Department.

2. The balancing of the equitable distribution slots is accomplished by:
Scheduling a meeting with the national contractors and the state grantees
and agreeing to the temporary redistribution of the slots.
3. Payments to, or on behalf of, participants in such positions shall not
exceed the amount of the unused funds available. Each individual
enrolled in such a position shall be informed in writing that the assignment
is temporary in nature and may be terminated. The sub-grantee shall first
seek to maintain full enrollment in authorized positions and shall seek to
schedule enrollments and terminations to avoid excessive terminations at
the end of the grant period. The State will not exceed the total number of
SCSEP positions approved for the State of *****. Agencies that exceed
the number of authorized positions must work cooperatively to stay within
the total number of approved positions for the State.
4. Maintenance of Effort
 - a. Host agencies of contractors in the ***** program have been
instructed to assure that SCSEP participants are not used to replace
other employed workers, workers on layoff or employees operating
under a contract. Host agencies are informed of this rule at the
time of application and follow-up is done at on-site reviews.
5. Procedures for Payroll and Payment of Workers' Compensation Costs
 - a. A participant shall be compensated for their training hours at \$6.85
an hour, which is the State minimum wage. Wages are disbursed
on a semi-monthly basis. A participant may select to pick his/her

check up, have it mailed to his/her home, or have it direct deposited in a bank account.

- b. Each participant shall file a time sheet for each training period indicating the dates and hours at the assignment. Time sheets will be submitted on a semi-monthly basis. The supervisor must sign each timesheet along with the participant's signature. The supervisor shall keep copies of the timesheets. Participants are protected by Workers' Compensation, which cover injuries received while on an assignment at a host agency. Host agencies do not pay workers' compensation claims. If a participant is involved in an accident or sustains an injury while at his or her training assignment, even though it may seem at the time to be very minor in nature, the participant should report the situation immediately to his/her host agency supervisor and the SCSEP office. Notification of injury or illness must occur within 24 hours. The sub-grantees pay all worker's compensation claims. The workers' compensation premiums being paid for the grant year 2006-2007 are \$5,460,000. Currently only one sub-grantee has one participant receiving worker's compensation benefits.

6. Collaboration

- a. The State SCSEP will enter into a Memorandum of Understanding (MOU) with the local One-Stop Workforce Center partner. SCSEP is not required to maintain a physical presence at a

comprehensive One-Stop Workforce Center, however under WIA, all required partners must provide WIA core services. The One-Stop Workforce Center must use a portion of their funds to help maintain the one-stop delivery system, which includes SCSEP. An MOU will identify services that are to be offered and costs to be shared between the sub-grantee SCSEP and the One-Stop Workforce Center.

- b. The Division of Aging and Adult Services, in partnership with the ***** Department of Labor and Employment, and the ***** Workforce Development Council bring the senior employment providers in the state together for regular meetings. These meetings include employment training and aging issues for networking and for information sharing. Networking quarterly meetings such as the Older Workers Task Force, are attended by representatives of state and local governments, SCSEP participants, and national SCSEP program representatives. Each quarterly meeting addresses the needs, concerns, and future of seniors in the workforce.

L. Reporting Requirements

- 1. The State will provide training for the new reporting and grant requirements provided to the sub-grantees by July31, 2007.
- 2. Each sub-grantee will be encouraged to hire a SCSEP worker to assist with the additional grant requirements.

3. July 1, 2007 through June 30, 2008, the sub-grantee will be surveying host agency employers and unsubsidized employers. The survey is designed to quantify the employer's satisfaction with the SCSEP program.
 - a. The sub-grantee will send out notices to alert the host agencies, participants, and employers that a survey is coming and they will need to complete the survey and send it back to the address listed.
 - b. The sub-grantee will follow-up on all agencies, employers, and participants that did not complete the survey.
 - c. The sub-grantee will follow-up on all agencies, employers, and participants that did not complete the survey.
 - d. The sub-grantee will follow-up on three separate occasions to ensure that as many agencies and individuals complete the survey as possible.
4. The ***** Older Workers Task Force that meets quarterly will include, as part of the agenda, the progress of performance standards and the reporting requirements.
5. Data collection and reporting will be completed via the Internet and the web based SCSEP Performance and Results Quarterly Progress Systems (SPARQ) program provided by DOL. The sub-grantees will use all available data to stay abreast of the latest changes and updates by DOL and the SPARQ contractors.
 - a. Data will be submitted on a timely and accurate basis.

- b. Sub-grantees will be legally obligated to enter the data required during the sub-grantees contractual year.
- c. The sub-grantees will send AAS a hard copy of the data submitted electronically every month by the 10th of each month.

M. Performance Measures

The sub-grantee will meet the new performance standard of 31% unsubsidized placement, 162% service level, 67% retention, and 68% most in need. The steps to meet the new performance standards are described in the plan of action of the grant application.

N. Equitable Distribution

The State and national sponsors work together through the ***** Older Work Task Force. The task force meets quarterly to discuss issues of interest and importance to the SCSEP, including equitable distribution. National sponsors operating in the state participate in the development of the equitable distribution plan. At this time there are no discrepancies in the equitable distribution in the state. The State lost ninety participant positions due to the minimum wage increase.

Section 3 - Geographic Areas To Be Served

***** Metro Area has 59 authorized positions in the following counties:

***County	6
*** County	7
*** County	1
*** County	31
*** County	1
*** County	1
*** County	7

***County	5
Total	59

Southern ***** has 45 authorized positions in the following counties:

*** County	03
*** County	05
*** County	04
*** County	06
*** County	01
*** County	02
*** County	07
*** County	0
*** County	07
*** County	03
*** County	07
Total	45

Section 4 – Program Administration

A. Organizational Structure

In ****, AAS administers the SCSEP program. The AAS is responsible for the management of the statewide Older Americans Act including Title III and Title VII. To ensure the goals of the program are met, the SCSEP Program Specialist is responsible for:

1. program on-site visits;
2. quarterly meetings;
3. the Equitable Distribution meeting;
4. the State Annual Plan;
5. the State grant;
6. quarterly program reports;
7. training sessions for sub-grantees;
8. new performance and reporting procedures;
9. Statewide educational promotion of SCSEP; and
10. continual review of SPARQ progress system.

B. Sub-Project Management

1. The State sub-contracts SCSEP with two separate contractors. The two community based organizations were selected through a Request for Proposal (RFP) competitive bid process. The subgrantees contracts are renewable on an annual basis.
2. ***** SCSEP is administered nationally by the *****. and throughout ***** by the *****. The project is sponsored locally by *****, a non-

profit agency serving older adults in the **** metropolitan area and rural areas of ***** since 1969. ***** is dedicated to promoting independence and enriching the quality of life as we age.

3. ***** was founded in 1978 and is a private, non-profit agency, which provides services, information, education, and leadership to help seniors maintain their dignity and independence. It provides service in various program areas and reaches over 65,000 seniors each year through its newsletter, “The Communicator”. *** sponsors the SCSEP in several **** metro counties.

C. Training of Sub-Project (local) Staff

1. Training of the sub-grantees staff is accomplished through regular technical assistance, provided in person and by phone. In addition, contract staff receives training through *****’s Older Worker Task Force meetings. Training is provided quarterly on employment and training issues such as: assessment and IEP development; WIA regulations and coordination; development of WIA Memoranda of Understanding (MOU) within local One- Stop Workforce Centers; updates on legislation; and issues related to older workers. The *****’s Older Worker Task Force includes training on aging issues such as elder abuse, exploitation, and neglect.

D. Project Monitoring

1. The SCSEP Program Specialist will be conducting program monitoring to assess the performance of the sub-grantee in the achievement of the goals and objectives of SCSEP as designed in the grant application. Each sub-grantee is required to transmit performance data to a web based data collection system on a regular basis. AAS reviews and assesses the web based data collection system on a monthly basis. In addition, the SCSEP Program Specialist conducts at least one on-site monitoring visit during the program year at each sub-grantee's site.
2. The grantee will monitor the sub-grantee to ensure the project is operating accordance with the SCSEP requirements as described below:
3. Review program accomplishments and management control systems.
 - a. Provide technical assistance as requested or required. The grantee will complete written monitoring and assessment reports including the overall achievement of goals and objectives of SCSEP sub-grantees by the State. A copy of the monitor/assessment report will be returned to the SCSEP sub-grantee, confirming the actions that the SCSEP sub-grantee will correct deficiencies, including target dates.
 - b. Follow-up monitoring of on site visits to the SCSEP sub-grantee to ensure the SCSEP sub-grantee is carrying out the recommended corrective action. If applicable, technical assistance will be provided as required.

- c. Provide assessment reports and follow-up actions in writing and maintain as part of the permanent record of the State SCSEP program.

E. Financial Monitoring

1. The report of expenditures and request for reimbursement of the funds expended are identified on DSA Form 520. The SCSEP sub-grantee transmits three copies of DSA 520 to the State Office – including a copy for the Accounting Office within ****. The request for reimbursement requires three signatures prior to payment.
2. The DSA 520 is designed as a monitoring tool for the actual expenditures and draw down of federal and non-federal funds in the following categories: Administration; Participant Wages/Fringe Benefits; and Participant Costs.
3. In addition, the sub-grantees are required to submit an annual plan for yearly expenditures. Each sub-grantee is required to transmit a Quarterly Expenditure Report (QER) to Aging and Adult Services, no later than 15 days after the close of the quarterly reporting periods. This document is used to monitor sub-grantees expenditure of project funds.
4. The **** Division of Aging and Adult Services will transmit the quarterly financial status report and the year-end closeout report to the U.S. Department of Labor.

F. File Maintenance

1. Each sub-grantee must retain enrollee records for a period of three years. File security of enrollee records must be maintained. Hard copy files will be held in locked file cabinets and electronic files will be accessible to sub-project staff through secure passwords.

G. Audits

1. The independent audit of ***** is enclosed. The audit was conducted by *****. The auditor found ***** to be in full compliance with OMB Circular A-133 for the year ending June 30, 2006.
2. The independent audit of *****. is enclosed. The audit was conducted by *****. The auditor found *****. to be in full compliance with OMB Circular A-133 for the year ended December 31, 2006. The 2006 audit is scheduled for the end of April 2007. The exit audit is scheduled for May, 2007.
3. The State Unit on Aging Policy Directive number 06-03 states– all non-profit agencies receiving \$25,000 or more in grant funds are required to have an audit conducted in accordance with OMB Circular A-110 by an independent registered certified public accountant. In order to assure compliance with OMB Circular A-110, a condition will be attached with the Notification of Grant Award issued to the non-profit agency administering the local SCSEP project. This condition mandates that the guidance for conducting organization-wide audits contained in OMB circular A-128 must be followed in the conduct of the audits required by the Department of Human Services Staff Manual, Volume 10. The SCSEP Program Specialist, who is assigned oversight of the program, monitors sub-grantees for compliance.

4. The independent ***** State Auditor, in accordance with an agreement with the Department of Human Services, the Federal cognizant agency, conducts the annual A-128 audit of the ***** Department of Human Services. When the completed audit is available, it will be forwarded to the U.S. Department of Labor SCSEP Office.

Section 5 Contingency Plans for Participants

A. Contingency Plans

1. Participants shall be notified in writing when changes to the program occur. A letter will be sent by mail to the participant describing the changes. The participant will be notified as soon as possible. The sub-grantee will give the participant a minimum of 30 days to make the necessary arrangements with the new grantee.
2. Records of all current participants will be turned over to the new grantee. Copies of participant records will be held by the sub-grantee for five years from the closing date of the program.
3. Every effort will be made to place all participants in another training program prior to the termination of the current program. Employment opportunities will continue to be pursued prior to the termination of the program.
4. Along with written notice of termination and transition to another grantee, the participant will be given the opportunity to participate in an in-service explaining the transition.
5. Payroll payments will continue to be made by the sub-grantee until participant program hours have ended and hours are paid. Once the participant makes the transition to the new grantee, payroll payments will be made by the new grantee.